COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Tidewater Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Naval Medical Center, Portsmouth
Portsmouth, Virginia
Permit No. TRO60293

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Naval Medical Center, Portsmouth, has applied for a renewal permit for its Title V Operating Permit for its medical facility. The Department of Environmental Quality has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact:_____ Date: November 14, 2007

Air Permit Manager: Date: November 14, 2007

Regional Director: Date: November 14, 2007

FACILITY INFORMATION

Permittee

Naval Medical Center, Portsmouth
620 John Paul Jones Circle
Portsmouth, Virginia 23708-2197

Facility

Naval Medical Center, Portsmouth
620 John Paul Jones Circle
Portsmouth, Virginia 23708-2197

County-Plant Identification No. 51-740-00007

SOURCE DESCRIPTION

NAICS 622 – Hospitals
Industries in the Hospitals subsector provide medical, diagnostic, and treatment services that include physician, nursing, and other health services to inpatients and the specialized accommodation services required by inpatients. Hospitals may also provide outpatient services as a secondary activity. Establishments in the Hospitals subsector provide inpatient health services, many of which can only be provided using the specialized facilities and equipment that form a significant and integral part of the production process.

NAICS 6221 – General Medical and Surgical Hospitals
NAICS 62211 – General Medical and Surgical Hospitals

COMPLIANCE STATUS

The facility is inspected every other calendar year, not consecutive years. The last inspection (full compliance inspection) was conducted on June 27, 2006. The facility was deemed to be in compliance at the time of that inspection.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following :

Emissions Unit ID	Stack ID	Emissions Unit Description	Size/Rated Heat Input Capacity, mmBTU/hr	Max Rated Output(Note 1)	Applicable NSR Permit
Boil-105	STBOIL-100	Nebraska Boiler NS-C-39S, 6/1/87	30.1	30,000 lb	5/9/02
Boil-106	STBOIL-100	Nebraska Boiler NS-C-39S, 3/15/86	36.0	30,000 lb	5/9/02
Boil-107	STBOIL-100	Nebraska Boiler NS-C-39, 9/15/83	37.6	30,000 lb	5/9/02
Boil-108	STBOIL-100	Nebraska Boiler NSB37, 1/15/82	24.0	20,000 lb	5/9/02
Boil-109	STBOIL-100	Cleaver Brooks 200-CT-7, Nov 94	51.0	40,000 lb	5/9/02
Boil-110	STBOIL-100	Cleaver Brooks 200-CT-7, Nov 94	51.0	40,000 lb	5/9/02
ICGF-002	STICGF-002, Bldg 20	Cummins Engine KTTA50-G2, May 95	10.2	1,000 kW (72%)	5/9/02
ICGF-003	STICGF-003, Bldg 20	Cummins Engine KTTA50-G2, May 95	10.2	1,000 kW (72%)	5/9/02
ICGF-004	STICGF-004, Bldg 20	Cummins Engine KTTA50-G2, May 95	10.2	1,000 kW (72%)	5/9/02
ICGF-005	STICGF-005, Bldg 20	Cummins Engine KTTA50-G2, May 95	10.2	1,000 kW (72%)	5/9/02

ICGF-006	STICGF-006, Bldg 20	Cummins Engine KTTA50-G2, May 95	10.2	1,000 kW (72%)	5/9/02
ICGF-007	STICGF-007, Bldg 20	Cummins Engine KTTA50-G2, May 95	10.2	1,000 kW (72%)	5/9/02
ICGF-008	STICGF-008, Bldg 3	Caterpillar Engine 3408B, 1989	4.50	380 kW	5/9/02
ICGF-009	STICGF-009, Bldg 3	Caterpillar Engine 3412, 1989	3.91	330 kW	5/9/02
ICGF-010	STICGF-010, Bldg 3	Caterpillar Engine 3408B, 1989	4.50	380 kW	5/9/02
ICGF-011	STICGF-011, Bldg 275	Cummins Engine NTA-855-G2, 1993	4.06	300 kW	5/9/02
ICGF-012	STICGF-012, Bldg 150	Caterpillar Engine 3306TA, 1999	2.41	230 kW	5/9/02
ICGF-013	STICGF-013, Bldg 273	Caterpillar Engine 3306B, 1991	2.44	180 kW	5/9/02
ICGF-015	STICGF-015, Bldg 273	Caterpillar Engine 3208, 1986	2.17	160 kW	5/9/02
ICGF-017	STICGF-017, Bldg 250	Caterpillar Engine 3406, Feb 95	3.73	300 kW	5/9/02
ICGF-019	STICGF-019, Bldg 274	Cummins Engine KTA-19T2, 1993	4.74	400 kW	5/9/02
WOOD-001	NA	Woodworking Shop	NA	NA	NA
DEGS-001, 002	NA	Degreaser and Brake Cleaning Unit	NA	NA	NA

Note 1: Output units are lb steam/hr for boilers, and kW (% of prime power) electrical output for IC generator units.
*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

EMISSIONS INVENTORY
Emissions are summarized in the following table:

Calendar Year 2006 Actual Emissions

	Criteria Pollutant Emission in Tons/Year				
	VOC	CO	SO_2	PM_{10}	NO_x
Total	1.3	14.7	1.2	2.0	25.0

EMISSION UNIT APPLICABLE REQUIREMENTS - Boilers

Limitations

The New Source Review permit issued May 9, 2002, contains specific requirements that have been incorporated into the Title V operating permit. A copy of the NSR permit is attached to the Statement of Basis.

The following Code of Federal Regulations has been determined to be applicable:

40 CFR part 60 subpart Dc - Small Industrial-Commercial-Institutional Steam Generating Units

Monitoring

The permit includes a requirement for monthly visual evaluations of each stack for compliance with the opacity limitation.

No periodic monitoring for the emissions limits for criteria pollutants is required in the permit. The following demonstration is provided to show that there is not a great likelihood that the Title V emission limits will be exceeded:

Example emissions unit size (Boiler 109) = 51 mmBtu/hr each (two Subpart Dc emissions units; the other four units are smaller heat input capacities)

Total heat input capacity for six units = 229.7 mmBtu/hr
Heating Value of Distillate Fuel = 140,000 Btu/gal
Sulfur Content of Fuel = 0.5%
Fuel Throughput = 5,430,000 gallons of distillate fuel combined
Hourly Throughput (example Boiler 109) = 51 mmBtu/hr / 140,000 Btu/gl=364 gl/hr per boiler
Total Maximum Hourly Throughput for six boilers: 1,640 gal/hr

Emission Factors from AP42 (Fuel Oil Combustion, 9/98) for Distillate Oil and from compliance testing for CO and NOx):

Pollutant	**Boil-105,106,108**	**Boil-107**	**Boil-109,110**	**[lb/1000 gal]**
SO_2	142S	142S	142S	[AP42, 9/98]
NO_X	13	10 (7/97 tests)	14 (12/95 tests)	[AP42, 9/98:20]
CO	5.0 (AP42, 9/98)	2.0	2.0 (12/95 tests)	[1.2, B109; .2, B110]
PM	2.0 (AP42, 9/98)	2.0	2.0	
PM-10	1.0 (AP42, 9/98)	1.0	1.0	
VOC	0.2 (AP42, 9/98)	0.2	0.2	

SO_2 Emissions:
(((142) x (0.5) / 1000) lb/gal) x (364 gal/hr) = ***25.9 lb/hr SO_2 per boiler***
Title V permitted rate = ***26.5 lb/hr SO_2 per boiler***
(((142) x (0.5) / 1000) lb/gal) x (5,430,000 gal/yr)/2000 lb/tn = ***192.8 tn/yr SO_2 for the plant***
Title V permitted rate = ***194.9 tn/yr SO_2 for the six-boiler plant***

NO_X Emissions (from each of Boilers 109, and 110, as worst case, hourly):
((14 / 1000) lb/gal) x (364 gal/hr) = ***5.1 lb/hr NO_X per boiler***
Title V permitted rate = ***7.4 lb/hr NO_X per boiler***
((14 / 1000) lb/gal) x (5,430,000 gl/yr) / 2000 lb/tn = ***38.0 tn/yr NO_X for the 6-boiler plant***
Title V permitted rate = ***54.3 tn/yr NO_X for the six-boiler plant***

CO Emissions (from each of Boilers 105, 106, and 108, as worst case, hourly):
((5 / 1000) lb/gal) x (364 gal/hr) = ***1.8 lb/hr CO per boiler***
Title V permitted rate = ***1.8 lb/hr CO per boiler***
((5 / 1000) lb/gal) x (5,430,000 gal/yr) / 2000 lb/tn = ***13.6 tn/yr CO for the 6-boiler plant***
Title V permitted rate = ***13.6 tn/yr CO for the six-boiler plant***

PM Emissions:
((2 / 1000) lb/gal) x (364 gal/hr) = ***0.7 lb/hr PM per boiler***
Title V permitted rate = ***0.7 lb/hr PM per boiler***
((2 / 1000) lb/gal) x (5,430,000 gal/yr) / 2000 lb/tn= ***5.4 tn/yr PM for the six-boiler plant***
Title V permitted rate = ***5.4 tn/yr PM for the six-boiler plant***

PM-10 Emissions:
((1 / 1000) lb/gal) x (364 gal/hr) = ***0.4 lb/hr PM-10 per boiler***
Title V permitted rate = ***0.4 lb/hr PM-10 per boiler***
((1 / 1000) lb/gal) x (5,430,000 gal/yr) / 2000 lb/tn= ***2.7 tn/yr PM-10 for the 6-boiler plant***
Title V permitted rate = ***2.7 tn/yr PM-10 for the six-boiler plant***

VOC Emissions:
((0.2 / 1000) lb/gal) x (364 gal/hr) = ***0.07 lb/hr VOC per boiler***
Title V permitted rate = ***0.1 lb/hr VOC per boiler***
((0.2 / 1000) lb/gal) x (5,430,000 gl/yr) / 2000 lb/tn= ***0.5 tn/yr VOC for the 6-boiler plant***
Title V permitted rate = ***1.0 tn/yr VOC for the six-boiler plant***

Based on the demonstration above, there is not a great likelihood that hourly emissions limits will be exceeded for the boilers, so no additional periodic monitoring other than opacity is specified.

Recordkeeping and Reporting

The permit includes requirements for maintaining records of emission data and operating parameters necessary to demonstrate compliance with the permit. These records include the type and amount of fuel combusted in the boilers, records of visual evaluations, visible emissions evaluations and any corrective action taken in regard to visible emissions, and fuel certifications. Recordkeeping and reporting as required by NSPS Subpart Dc has been incorporated into the permit as well.

Testing

The permit does not require source tests. The Department and EPA have the authority to require testing not included in the permit if necessary to determine compliance with an emission limitation or standard.

Streamlined Requirements

The permit does not include any streamlined requirements for these emissions units.

EMISSION UNIT APPLICABLE REQUIREMENTS - Generators

Limitations

The New Source Review permit issued May 9,2002, contains specific requirements that have been incorporated into the Title V operating permit. A copy of the NSR permit is attached to the Statement of Basis. There are no Federal regulations applicable to these generators.

Monitoring

The permit includes a requirement for monthly visual evaluations of each stack for compliance with the opacity limitation.

No periodic monitoring for the emissions limits for criteria pollutants is required in the permit. The following demonstration is provided to show that there is not a great likelihood that the Title V emission limits will be exceeded:

The following demonstration is provided to show that there is not a great likelihood that the hourly emission limits in the Title V permit will be exceeded:

AP42 Emission Factors from Section 3.4, Large Stationary Diesel and All Stationary Dual-fuel Engines:

PM = 0.1 lb/mmBtu
SO_2 = 1.01S lb/mmBtu, where S = weight percent of sulfur in the fuel
NO_2 - 1.9 lb/mmBtu
CO - 0.85 lb/mmBtu
VOC - 0.0819 lb non-methane VOC/mmBtu
Weight percent of sulfur = 0.5
Emission Units ICGF-002 through 007 = 10.2 mmBtu/hr, each

Particulate Matter Emissions from ICGF-002 through 007, each:

PM = 0.1 lb/mmBtu x 10.2 mmBtu/hr = ***1.0 lbs/hr, each***
Title V permitted rate = ***3.6 lbs/hr PM, each***

Sulfur Dioxide Emissions from ICGF-002 through 007, each:

SO_2 = [(1.01)(0.5) lb/mmBtu] x 10.2 mmBtu/hr = ***5.1 lbs/hr, each***
Title V permitted rate = ***5.4 lbs/hr, each***

Nitrogen Dioxide Emissions from ICGF-002 through 007, each:

NO_2 = 1.9 lb/mmBtu x 10.2 mmBtu/hr = ***19.4 lbs/hr each***
Title V permitted rate = ***33.2 lbs/hr, each***

Carbon Monoxide Emissions from ICGF-002 through 007, each:

CO - 0.85 lb/mmBtu x 10.2 mmBtu/hr = ***8.7 lbs/hr, each***
Title V permitted rate = ***6.4 lbs/hr, each***

VOC Emissions from ICGF-002 through 007, each:

VOC-0.0819 lb VOC/mmBtu x 10.2 mmBtu/hr=***0.84 lb VOC/hr, each***
Title V permitted rate = ***0.9 lbs/hr, each***

Based on the demonstration above, there is not a great likelihood that hourly emissions limits will be exceeded for the boilers, so no additional periodic monitoring other than opacity is specified.

Recordkeeping and Reporting

The permit includes requirements for maintaining records of emission data and operating parameters necessary to demonstrate compliance with the permit. These records include the fuel type and throughput for the generators, records of visual evaluations, visible emissions evaluations and any corrective action taken in regard to visible emissions, records of maximum electric load production levels, fuel supplier certifications, and written operating procedures.

The engine generator sets operate significantly less than that permitted to allow for unanticipated demands. Engine generator sets ICGF-002 through 007 operate between 100 and 200 hours per year. Generator sets ICGF-008 through ICGF-019 have operated 10 to 20 hours per year. The facility fuel limit of 784,000 gallons of diesel fuel oil per year would be sufficient for 1577 hr/yr for each of engines ICGF-002 through 007, and 500 hr/yr for each of the engines ICGF-008 to 013, 015, 017, and 019. Recordkeeping is specified as the primary method of periodic monitoring.

Testing

The permit does not require source tests. The Department and EPA have the authority to require testing not included in the permit if necessary to determine compliance with an emission limitation or standard.

Streamlined Requirements

The permit does not include any streamlined requirements for these emissions units.

EMISSION UNIT APPLICABLE REQUIREMENTS – Woodworking Equipment

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable for woodworking emissions units:

9 VAC 5, Chapter 40, Part II, Article 17 – Emission Standards for Woodworking Operations
9 VAC 5, Chapter 50, Part II, Article 1 – Visible Emissions and Fugitive Dust/Emissions

Monitoring and Recordkeeping

Woodworking Shop emissions: Controlled emissions are not visible, and by engineering judgment, are assumed to be less than 5 grains/dscf. Exhaust flow was tested at a maximum rate of 30.49 cuft/min.

Maximum potential hourly emissions are therefore:
30.49 cuft/min x 0.05 gr/dscf x lb/7000 grains x 60 min/hr = 0.0131 lb PM/hr

Maximum potential annual emissions are:
0.0131 lb PM/hr x 8760 hr/yr x ton/2000 lb = 0.057 tons PM/yr

Since the potential for emissions is small, no limits are assigned. Periodic monitoring for this emissions unit is proposed as visual observations of emissions from emissions units and the control device, and corresponding recordkeeping consisting of log entries to ensure no visible emissions are present, and to correct and record occurrences of malfunctions.

Testing

The permit does not require source tests. The Department and EPA have the authority to require testing not included in the permit if necessary to determine compliance with an emission limitation or standard.

Streamlined Requirements

The permit does not include any streamlined requirements for this emissions unit.

EMISSIONS UNIT APPLICABLE REQUIREMENTS - Cold Cleaning Degreaser and Brake Cleaning Unit

Limitations (Degreaser and Brake Cleaner)
The following Virginia Administrative Codes with emissions-specific requirements have been determined to be applicable:

9 VAC 5, Chapter 40, Part II, Article 24 – Solvent Metal Cleaning Operations
9 VAC 5, Chapter 40, Part II, Article 1 – Visible Emissions and Fugitive Dust/Emissions

Monitoring and Recordkeeping

There are no specific monitoring and recordkeeping requirements for these units. The permittee is required to comply with the work practice standards outlined in 9 VAC 5, Chapter 40, Part II, Article 24.

Testing

The permit does not require source tests. The Department and EPA have the authority to require testing not included in the permit if necessary to determine compliance with an emission limitation or standard.

Streamlined Requirements

The permit does not include any streamlined requirements for these emissions units.

FACILITY-WIDE CONDITIONS

The permit includes a standard for asbestos demolition and removal (40 CFR part 61 subpart M). Asbestos removal is not a standard occurrence at the facility. In the event that asbestos demolition and removal are necessary, the permittee will comply with the appropriate notification requirements. The permit contains general testing requirements which must be followed in the event testing is conducted to demonstrate compliance with permit conditions, periodic monitoring requirements for opacity for all significant emissions units, and a requirement in the case of a violation of ambient air quality standards. Also included is the volatile organic liquid disposal requirement.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

B. Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.1-20.01:2 and §10.1-1185 of the *Code of Virginia,* and the "Department of Environmental Quality Agency Policy Statement No. 3-2006".

F. Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

U. Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

Y. Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

STATE-ONLY APPLICABLE REQUIREMENTS

The following Virginia Administrative Codes have specific requirements only enforceable by the State and have been identified as applicable by the applicant:

9 VAC 5-40-140	Existing Source Standard for Odor
9 VAC 5-40-180	Existing Source Standard for Toxic Pollutants

9 VAC 5-50-140 New and Modified Source Standard for Odorous Emissions
9 VAC 5-50-180 New and Modified Source Standard for Toxic Pollutants

INAPPLICABLE REQUIREMENTS

The startup, shut down, and malfunction opacity exclusion listed in 9 VAC 5-40-20 A 3 cannot be included in any Title V permit. This portion of the regulation is not part of the federally approved state implementation plan. The opacity standard applies to existing sources at all times including startup, shutdown, and malfunction. Opacity exceedances during malfunction can be affirmatively defended provided all requirements of the affirmative defense section of this permit are met. Opacity exceedances during startup and shut down will be reviewed with enforcement discretion using the requirements of 9 VAC 5-40-20 E, which state that "At all times, including periods of startup, shutdown, soot blowing and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions."

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emissions Unit No.	Emissions Unit Description	Citation Code*	Pollutant(s) Emitted (5-80-720 B)	Rated Capacity (5-80-720C)
FREN-001	Freon Recovery Unit	2	CFC-12	NA
FREN-002	Freon Recovery Unit	2	HCFC-123	NA
FREN-003	Freon Recovery Unit	2	CFC-12, CFC-22	NA
FREN-004	Freon Recovery Unit	2	CFC-12, CFC-22	NA
FREN-005	Freon Recovery Unit	2	CFC-12, CFC-22	NA
FREN-006	Freon Recovery Unit	2	CFC-12, CFC-22	NA
FREN-007	Freon Recovery Unit	2	CFC-12, CFC-22	NA
GSTA-001	Vehicle Maintenance Facility Gasoline/Diesel Pumping Tank	2	2,2,4-Trimethylpentane, Benzene, Ethylbenzene, Hexane, Toluene, VOC, Xylenes (mixed isomers)	NA
LABS-ALL	Lab Hoods in the Charette Health Care Center	2	Formaldehyde, Methanol, VOC, Xylenes(mixed isomers)	NA
LABS-012	Still Room, Sterilization Material Recycling Process in the Central Energy Plant (Bldg	2	Formaldehyde, VOC, Xylenes (mixed isomers)	NA

	20)			
MISC-003	Masonry Shop	1	PM, PM_{10}	NA
OCOM-ALL	Space Heaters (<0.3 mmBTU/hr)	1	Carbon monoxide, PM, PM_{10}, NO_X, SO_X, VOC	NA
TNKA-002	Horizontal Fixed Roof, Distillate Fuel Oil No. 2 Storage Tank	2	VOC	NA
TNKA-003	Horizontal Fixed Roof, Distillate Fuel Oil No. 2 Storage Tank	2	VOC	NA
TNKA-008	Horizontal Fixed Roof, Distillate Fuel Oil No. 2 Storage Tank	2	VOC	NA
TNKA-009	Distillate Fuel Oil No. 2 Storage Tank (55,000 gallons)	2	VOC	NA
TNKA-010	Distillate Fuel Oil No. 2 Storage Tank (55,000 gallons)	2	VOC	NA
TNKA-011	Distillate Fuel Oil No. 2 Storage	2	VOC	NA
TNKA-018	Horizontal Fixed Roof, Distillate Fuel Oil No. 2 Storage Tank	2	VOC	NA
TNKA-019	Horizontal Fixed Roof, Distillate Fuel Oil No. 2 Storage Tank	2	VOC	NA
TNKA-020	PWC 2,000 gallon Gasoline Storage Tank	2	VOC	NA
TNKA-022	Horizontal Fixed Roof, Distillate Fuel Oil No. 2 Storage Tank	2	VOC	NA
TNKA-024	Horizontal Fixed Roof, Distillate Fuel Oil No. 2 Storage Tank	2	VOC	NA
TNKA-025	Horizontal Fixed Roof, Distillate Fuel Oil No. 2 Storage Tank	2	VOC	NA
TNKA-026	Horizontal Fixed Roof, Distillate Fuel Oil No. 2 Storage Tank	2	VOC	NA

TNKA-027	Horizontal Fixed Roof, Distillate Fuel Oil No. 2 Storage Tank	2	VOC	NA
TNKA-028	Horizontal Fixed Roof, Distillate Fuel Oil No. 2 Storage Tank	2	VOC	NA
TNKA-029	Horizontal Fixed Roof, Distillate Fuel Oil No. 2 Storage Tank	2	VOC	NA
TNKA-030	Horizontal Fixed Roof, Distillate Fuel Oil No. 2 Storage Tank	2	VOC	NA
TNKA-031	MWR 250 gallon Gasoline Tank	2	VOC	NA
TNKA-032	Horizontal Fixed Roof, Distillate Fuel Oil No. 2 Storage Tank	2	VOC	NA
TNKU-004	Horizontal Underground, Distillate Fuel Oil No. 2 Storage Tank	2	VOC	NA
TNKU-006	Horizontal Underground, Distillate Fuel Oil No. 2 Storage Tank	2	VOC	NA
TNKU-013	Horizontal Underground, Lubrication Oil Storage Tank	2	VOC	NA
TNKU-014	Horizontal Underground, Waste Oil Storage Tank	2	VOC	NA
SOLD-001	Soldering/Brazing	1	PM, PM10	NA
WELD-001	Welding Rods: A) 14Mn-4Cr, B) E70S, C) ER316, D) 4043.	1	PM, PM10	NA
WSTL-001	Tank Secondary Containment Oil/Water Separator for TNKA-010	2	VOC	NA

WSTL-002	Tank Secondary Containment Oil/Water Separator for TNKA-011	2	VOC	NA

*Citation Codes:
1 Named insignificant emissions unit
2 Insignificant by virtue of emission levels
3 Insignificant by size or production level (rated capacity)

These emissions units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emissions units in accordance with 9 VAC 5-80-110.

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit will be placed on public notice in The Virginian-Pilot from September 28, 2007 to October 29, 2007.